

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT NEW YORK**

**CHARON COINS, LLC**

**Plaintiff,**

**v.**

**Civil Action No. 7:21-cv-02777-VB**

**SONEA GRIFFITHS,**

**,**

**Defendant.**

\_\_\_\_\_ /

**SECOND AMENDED COMPLAINT**

**EXHIBIT F**



FW: BMO Harris / DJG

REDACTED

**Benjamin R. Prinsen**

ATTORNEY

**KRAVIT ■ HOVEL & KRAWCZYK, s.c.**

825 N. Jefferson, Milwaukee, WI 53202 3737

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**From:** A dort, Julie <[JulieA.dort@bmo.com](mailto:JulieA.dort@bmo.com)>  
**Sent:** Friday, March 5, 2021 1:11 PM  
**To:** Benjamin R. Prinsen <[hrp@kravitaaw.com](mailto:hrp@kravitaaw.com)>  
**Cc:** Dawn M. Head <[dmh@kravitaaw.com](mailto:dmh@kravitaaw.com)>  
**Subject:** RE: BMO Harris / DJG

Ben,

Below is the information that was previously provided to the customer regarding the returned wires. It shows the financial institution suggest reaching out to them to find out why they believed there was fraud and why they requested the return. All of the wires have been returned, but the wires to Wells Fargo totaling \$3,053.55. The customer made a cash deposit of \$2,010.00 on 1/25/21. BMO has issued a Cashier's Check payable to DJG Holdings and sent it to the address on file for that sum. The remaining funds (\$1,959.24) will be returned to Wells Fargo as a partial wire return on 3/15/21.

Tran ID	Debit Party ID	Debit Party Name	Credit Party ID	Credit Party Name	Status	Amount	Currency	DTTM Received
HAR210119956882		REGIONS BK BHAM		DJG HOLDINGS LLC	Completed	5,000.00	USD	2021-01-19 10:52:19:372
HAR210125052995		WELLS FARGO SF		DJG HOLDINGS LLC	Completed	1,050.00	USD	2021-01-25 15:54:17:312
HAR210128108706		WELLS FARGO SF		DJG HOLDINGS LLC	Completed	1,003.05	USD	2021-01-28 11:49:40:929
HAR210202190791		TD BANK		DJG HOLDINGS LLC	Completed	54,000.00	USD	2021-02-02 13:31:58:130
HAR210205255024		TD BANK		DJG HOLDINGS LLC	Completed	154,000.00	USD	2021-02-05 14:35:13:825
HAR210208267153		JPMORGAN CHASE		DJG HOLDINGS LLC	Completed	6,000.00	USD	2021-02-08 08:02:56:356
HAR210211332117		WELLS FARGO SF		DJG HOLDINGS LLC	Completed	1,000.50	USD	2021-02-11 11:25:01:853
HAR210211334335		TD BANK		DJG HOLDINGS LLC	Completed	40,000.00	USD	2021-02-11 12:38:11:344

From: Benjamin R. Prinsen <brp@kravitaw.com>  
 Sent: Friday, March 5, 2021 12:13 PM  
 To: A. Dort, Julie <Julie.A.dort@bmo.com>  
 Cc: Dawn M. Head <dmh@kravitaw.com>  
 Subject: RE: BMO Harris / DJG

**External Email:** Use caution with links and attachments **Courriel externe :** Faites preuve de prudence en ce qui a trait aux liens et aux pièces jointes

Julie,

Thank you for the email, but this is very vague

What funds were returned? Are the funds in the account (before 8 weeks)? When did BMO receive the request to return the funds and from whom? Where were they sent? When were they returned?

Our client's account was frozen for 11 days with a most no information, and now, for the first time, we are finding out that the funds were returned without authorization, consent, or even notice. We have no information as to the basis of the assertion that a "fraud" occurred here, or whether that is BMO's belief or someone else's. We need to understand the details of how and why this occurred.

Please feel free to contact me any time today

Ben

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**Benjamin R. Prinsen**

ATTORNEY

**KRAVIT ■ HOVEL & KRAWCZYK, s.c.**

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**From:** A dort, Ju e <[Ju\\_e\\_A\\_dort@bmo.com](mailto:Ju_e_A_dort@bmo.com)>  
**Sent:** Friday, March 5, 2021 11:46 AM  
**To:** Benjamin R. Prinsen <[brp@kravtaw.com](mailto:brp@kravtaw.com)>  
**Subject:** FW: BMO Harris / DJG

Ben,

John Krtay forwarded your email to me regarding the DJG account. My understanding is that your client was advised that the freeze had been made pursuant to his deposit agreement with the Bank based on advances that the deposits into the account were fraudulent. The financial institutions originating the deposits requested that the funds be returned. BMO has returned the funds. Thus, your client should contact the originating financial institutions to find out the basis for the fraudulent allegations. The account remains frozen pending the fraud investigation. If your client would like to provide additional information to BMO's fraud investigators for the reconsideration, please let me know or have him reach out to them directly.

Best regards,

**Julie Rodriguez Aldort** (Pronouns: She/Her)

Senior Counsel & Vice President | Legal & Regulatory Compliance | BMO Financial Group | 312.461.7905 | [ju\\_e\\_a\\_dort@bmo.com](mailto:ju_e_a_dort@bmo.com)

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**From:** Benjamin R. Prinsen <[brp@kravtaw.com](mailto:brp@kravtaw.com)>  
**Sent:** Friday, March 5, 2021 8:57 AM  
**To:** Krtay, John <[JKrtay@gk.com](mailto:JKrtay@gk.com)>  
**Cc:** Dawn M. Head <[dmh@kravtaw.com](mailto:dmh@kravtaw.com)>  
**Subject:** BMO Harris / DJG

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